

EXHIBIT B

From: [Danninger, Timothy](#)
To: [Jeffrey L. Haberman](#)
Cc: [Farrell, Peter A.](#); renee.smith@kirkland.com; mguzman@kelloggghansen.com; John.Massaro@arnoldporter.com; david.kouba@arnoldporter.com; [Jonathan R. Gdanski](#); [Megan L. Barrett](#); [Johnson, Bradley](#); [Steif, Andrew](#); [Purdy, Lauren](#); [Wilson, Gabrielle](#); [O'Hickey, Grant](#)
Subject: RE: SERVICE OF COURT DOCUMENTS
Date: Friday, September 8, 2023 11:57:09 AM
Attachments: [image001.png](#)

Jeff:


We understand your desire to take Mr. McKnight's deposition before the discovery period afforded under CMO 17. We agree with you that, if necessary, the appropriate course is to move the court to alter the order of events in Mr. McKnight's case. Could you please provide a summary of Mr. McKnight's current condition and limitations in order for us to consider the necessity of a preservation deposition? To the extent it is necessary, we will work with you on an agreement to depose Mr. McKnight, provided it is approved by the court.

Let us know if you have any questions or want to discuss.

Tim

From: Jeffrey L. Haberman <JHaberman@schlesingerlaw.com>
Sent: Friday, August 25, 2023 4:51 PM
To: JUUL_PlaintiffDiscovery@kirkland.com; JUULDiscovery@arnoldporter.com
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Subject: SERVICE OF COURT DOCUMENTS

Dear Counsel:

In this link you will find the material required to be produced pursuant to MDL CMO 17 and JCCP CMO 15 for our clients who have opted out of the settlement.  [SLO Opt Out Clients' Document and Record Production](#)

In addition, we write to notify you that we will be moving the Court to lift the stay of discovery as to Walker McKnight so that we can take his deposition and preserve his testimony. Mr. McKnight underwent a double lung transplant and a kidney transplant in April 2022 as a result of injuries he sustained that were caused by Juul. Time is of the essence to preserve Walker's testimony. We seek to take this deposition at the end of September. Please let us know by COB on Monday, August 28th if you'll agree to our noticing his deposition without Court intervention.

Please note we served the designated email addresses provided in the MDL and JCCP orders, let us know if additional counsel should be served.

Sincerely yours,

Jeff Haberman

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